

Exhibit 3

From: ThucMinh Nguyen <TNguyen@kasowitz.com>
Sent: Thursday, May 22, 2025 1:01 PM
To: Wallace Dunwoody <wdunwoody@munckwilson.com>
Cc: Mark Siegmund <MSiegmund@cjsjlaw.com>; SWA-IV <SWA-IV@munckwilson.com>; Intellectual Ventures <IntellectualVentures@kasowitz.com>; William Ellerman <wellerman@cjsjlaw.com>
Subject: Re: Intellectual Ventures v. Southwest - Motion for Leave

Counsel,

During our meet and confer regarding IV's anticipated move for leave to amend the complaint tomorrow, you requested a revised proposed schedule. Please find the requested schedule attached for your review.

Additionally, during our meet and confer, counsel for Southwest indicated that Southwest's venue deponent testified that Southwest does not perform unlicensed use cases of Kubernetes, Spark, and Hadoop. We explained that Southwest's witness was not prepared to testify regarding Southwest's private cloud and identified another witness who had knowledge of these use cases. We explained that Southwest's witness did not have knowledge regarding unlicensed hosting services such as EC2. We asked during the call for Southwest to represent that these use cases are not and were not used by Southwest during the damages time period and Southwest was unable to confirm the same. To be clear, IV has no interest in pursuing claims that your clients can confirm after a reasonable investigation that you do not perform at all. To this end, please let us know if Southwest will provide a declaration confirming no unlicensed use of Kubernetes, Spark, and Hadoop or reasonably similar technology during the damages time period.

Regards,
Minh

On May 22, 2025, at 11:17 AM, Wallace Dunwoody <wdunwoody@munckwilson.com> wrote:

ALERT: THIS IS AN EXTERNAL EMAIL. DO NOT CLICK ON ANY LINK, ENTER A PASSWORD, OR OPEN AN ATTACHMENT UNLESS YOU KNOW THAT THE MESSAGE CAME FROM A SAFE EMAIL ADDRESS.

Counsel –

As discussed yesterday, we are concerned with the logistics of how adding new patent claims at this point will impact the current case schedule. Please send us your proposal for how to modify the case schedule to accommodate adding the new patent claims.

Best regards,

Wallace Dunwoody
Munck Wilson Mandala, LLP

2000 McKinney Avenue, Suite 1900, Dallas, TX 75201
Office: (972) 628-3636 Mobile: (214) 536-2297

From: Mark Siegmund <MSiegmund@CJSJLAW.com>
Sent: Wednesday, May 21, 2025 9:54 AM
To: Wallace Dunwoody <wdunwoody@munckwilson.com>
Cc: SWA-IV <SWA-IV@munckwilson.com>; Intellectual Ventures <IntellectualVentures@kasowitz.com>; William Ellerman <wellerman@CJSJLAW.com>
Subject: Re: Intellectual Ventures v. Southwest - Motion for Leave

[External]

Hi Wallace,

That works with us.

Sent from my iPad

On May 20, 2025, at 6:16 PM, Wallace Dunwoody <wdunwoody@munckwilson.com> wrote:

Tomorrow afternoon is fine to discuss. How about 2:30 CT?

Best regards,

Wallace Dunwoody
Munck Wilson Mandala, LLP

2000 McKinney Avenue, Suite 1900, Dallas, TX 75201
Office: (972) 628-3636 Mobile: (214) 536-2297

From: Mark Siegmund <MSiegmund@CJSJLAW.com>
Sent: Tuesday, May 20, 2025 4:05 PM
To: SWA-IV <SWA-IV@munckwilson.com>

Cc: Intellectual Ventures <IntellectualVentures@kasowitz.com>; William Ellerman
<wellerman@CJSJLAW.com>

Subject: Intellectual Ventures v. Southwest - Motion for Leave

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Counsel,

IV intends to move for leave to add four additional patents in the case against Southwest by this Friday. We are happy to meet and confer with Southwest to discuss, but we need to schedule the meet and confer this week. Otherwise we will assume Southwest is opposed. Please let us know your availability for tomorrow afternoon, Thursday 1-2, 4-6 central, or Friday after 2:00pm central.

Sincerely,
Mark

MARK SIEGMUND

PARTNER

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